

Robert A. Schachter (RS7163)  
ROBINSON BROG LEINWAND GREENE  
GENOVESE & GLUCK, P.C.  
1345 Avenue of the Americas  
31st Floor  
New York, NY 10105  
Tel: 212.603.6300  
Fax: 212.956.2164  
*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

Do Denim, LLC,

Plaintiff,

-against-

08 Civ. 6518  
(PKC)

**NOTICE OF MOTION**

E.K. Denim Group, Inc.,

Defendant.

-----X

**PLEASE TAKE NOTICE** that upon the accompanying Affirmation of Daniel Zohny, Esq., dated September 2, 2008, the Affirmation of Robert A. Schachter, Esq., dated September 2, 2008, the affidavit of Salomon Murciano, dated August 20, 2008, and all the pleadings and proceedings heretofore had herein, Plaintiff, Do Denim, LLC, shall move this Court before the Honorable P. Kevin Castel on the 23<sup>rd</sup> day of September, 2008, at the United States Courthouse located at 500 Pearl Street, New York, New York, at 10:00 a.m. in the forenoon or as soon thereafter as counsel may be heard, for the entry of a default judgment pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure against Defendant E.K. Denim Group, Inc. awarding the Plaintiff a permanent injunction, monetary damages in an amount to be determined by the Court, costs and disbursements, including reasonable attorneys' fees, in an amount to be determined by the Court, and for such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to Rule 6.1 (b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, answering papers, if any, are required to be served within ten (10) business days after service of the moving papers.

Dated: New York, New York  
September \_\_, 2008

Respectfully submitted,

ROBINSON BROG LEINWAND GREENE  
GENOVESE & GLUCK, P.C.

By: 

Robert A. Schachter (RS7163)

*Attorneys for the Plaintiff*

1345 Avenue of the Americas

31<sup>st</sup> Floor

New York, NY 10105

Tel: 212.603.6300

Fax: 212.956.2164